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Attorneys for Defendant Farm Bureau Property & Casualty Insurance Company

IN UNITED STATES DISTRICT COURT IN AND FOR
THE DISTRICT OF UTAH, SOUTHERN DIVISION

<p>WENDY GRAHAM, an individual, Plaintiff,</p>	<p>NOTICE OF REMOVAL</p>
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v.

FARM BUREAU PROPERTY AND
CASUALTY INSURANCE COMPANY,
a Foreign Business Corporation, JOHN DOES
1-5, individuals, JANE DOES 1-5, individuals,
BLACK CORPORATIONS 1-5,

Defendants.

Civil No. 4:25-CV-00055

NOTICE IS HEREBY GIVEN that Defendant Farm Bureau Property & Casualty Insurance Company, by and through its counsel of record, Morgan, Minnock, Rice & Miner, L.C., hereby removes this action from the Sixth Judicial District Court, Sevier County, State of Utah, to the United States District Court for District of Utah, Southern Division, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446 and respectfully states as follows:

1. Plaintiffs filed this civil action, Case Number 250600020, against Defendants in the Sixth Judicial District Court, Sevier County, State of Utah, on or about March 18, 2025. A copy of the Complaint is attached as Exhibit “A.”
2. Defendants were served on or about April 11, 2025. A copy of the Process Server Delivery Details and Summons is attached as Exhibit “B.”
3. As more fully set forth below, this case is properly removed to this Court pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 because Defendant Farm Bureau Property & Casualty Insurance Company has (1) satisfied the procedural requirements for removal, and (2) this Court has subject matter jurisdiction over this action under 28 U.S.C. § 1332.
4. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon Counsel for Plaintiffs, and a copy is also being filed with the Clerk of the Court for the Sixth Judicial District Court.
5. With respect to diversity, citizenship of the parties to this action is set forth below.
6. Upon information, Plaintiff Wendy Graham is a resident of the State of Utah.
7. Defendant Farm Bureau Property & Casualty Insurance Company is an Iowa Corporation, with its principal place of business in the State of Iowa.
8. Based on the foregoing, there is complete diversity of the parties.
9. With respect to the amount in controversy, Plaintiffs are alleging damages in excess of \$900,000. Complaint, ¶ 53, Exhibit “A.”
10. Based on the foregoing, Plaintiffs’ alleged injuries and damages are sufficient to support a claim in excess of \$75,000, and satisfy the requisite amount in controversy for removal of this case.

11. Due to the complete diversity of the Parties to this action, and the amount in controversy in excess of \$75,000, this case meets the requirements for removal to Federal Court, pursuant to 28 U.S.C. § 1332.

WHEREFORE, Defendant Farm Bureau Property & Casualty Insurance Company removes this action from the Sixth Judicial District Court, Sevier County, State of Utah, pursuant to 28 U.S.C. § 1441, and respectfully request that this Court assume complete jurisdiction over this action and exclude any further proceedings in State Court.

DATED this 28th day of April 2025.

MORGAN, MINNOCK, RICE & MINER, L.C.

/s Joseph E. Minnock

Joseph E. Minnock

Attorneys for Defendant Braydon Peterson

CERTIFICATE OF MAILING

I hereby certify that on this 28th day of April 2025, I caused a true and correct copy of the foregoing **NOTICE OF REMOVAL** to be mailed via first-class mail, postage prepaid, to the following:

D. Bruce Oliver
46 South Main
P.O. Box 146
Mayfield, UT 84643
bruceoliverlaw@gmail.com

/s Joseph E. Minnock